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1	WRIGHT, FINLAY & ZAK, LLP			
2	Darren T. Brenner, Esq.			
	Nevada Bar No. 8386			
3	Lindsay D. Robbins, Esq. Nevada Bar No. 13474			
4	7785 W. Sahara Ave., Suite 200			
5	Las Vegas, NV 89117 (702) 475-7964; Fax: (702) 946-1345			
6	lrobbins@wrightlegal.net			
7	Attorneys for Plaintiff, Deutsche Bank Trust Company Americas as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS3			
8	UNITED STATES DISTRICT COURT			
9	DISTRICT	OF NEVADA		
10	DEUTSCHE BANK TRUST COMPANY AMERICAS AS TRUSTEE FOR	Case No.: 2:20-cv-02220-JCM-EJY		
11	RESIDENTIAL ACCREDIT LOANS, INC.,			
12	MORTGAGE ASSET-BACKED PASS- THROUGH CERTIFICATES, SERIES 2006-	STIPULATION AND ORDER TO EXTEND TIME PERIOD TO RESPOND		
13	QS3,	TO MOTIONS TO DISMISS [ECF Nos. 15-16]		
14	Plaintiff,			
15	VS.	[First Request]		
16	FIDELITY NATIONAL TITLE GROUP,			
17	INC.; COMMONWEALTH LAND TITLE COMPANY; EQUITY TITLE, LLC dba			
	EQUITY TITLE OF NEVADA; DOE			
18	INDIVIDUALS I through X; and ROE			
19	CORPORATIONS XI through XX, inclusive,			
20	Defendants.			
21				
22	Plaintiff, Deutsche Bank Trust Company Americas as Trustee for Residential Accredit			
23	Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS3 ("Deutsche			
24	Bank"), Specially-Appearing Defendant Fidelity National Title Group, Inc. ("Fidelity") and			
25	Defendant Commonwealth Land Title Insurance Company ("Commonwealth", collectively			
26	"Defendants"), by and through their counsel of record, hereby stipulate and agree as follows:			
27	1. On December 8, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District			
28	Court, Case No. A-20-826046-C [ECF No. 1-1];			
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1		2.	On December 8, 2020, Commonwealth filed its Petition for Removal to this Court
2			[ECF No. 1];
3		3.	On January 27, 2021, Commonwealth filed a Motion to Dismiss [ECF No. 15];
4		4.	On January 27, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 16];
5		5.	Deutsche Bank's deadline to respond to Defendants' Motions to Dismiss is currently
6			February 10, 2021;
7		6.	Deutsche Bank's counsel is requesting an extension until March 15, 2021, to file its
8			response to the pending Motions to Dismiss;
9		7.	This extension is requested to allow Deutsche Bank additional time to finalize and
10			file its response to the pending Motions to Dismiss as lead handling counsel for
11			Deutsche Bank continues to recover from an unexpected medical emergency.
12		8.	Counsel for Defendants does not oppose the requested extension;
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1 9. This is the first request for an extension which is made in good faith and not for 2 purposes of delay. 3 IT IS SO STIPULATED. DATED this 9th day of February, 2021. DATED this 9th day of February, 2021. 4 5 WRIGHT, FINLAY & ZAK, LLP SINCLAIR BRAUN LLP 6 /s/ Lindsay D. Robbins /s/ Kevin S. Sinclair Lindsay D. Robbins, Esq. Kevin S. Sinclair, Esq. 7 Nevada Bar No. 13474 Nevada Bar No. 12277 8 7785 W. Sahara Ave., Suite 200 16501 Ventura Boulevard, Suite 400 Las Vegas, NV 89117 Encino, California 91436 9 Attorneys for Plaintiff, Deutsche Bank Trust Attorney for Defendants, Fidelity National 10 Company Americas as Trustee for Title Group, Inc. and Commonwealth Land Residential Accredit Loans, Inc., Mortgage *Title Insurance Company* 11 Asset-Backed Pass-Through Certificates, Series 2006-QS3 12 13 IT IS SO ORDERED. 14 Dated February 10, 2021. 15 allus C. Mahan 16 UNITED STATES DISTRICT COURT JUDGE 17 18 19 20 21 22 23 24 25 26 27 28